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05 August 2015

Our Ref: J27035/ J31314
Your Ref: Email received 05 August 2011

Email: adrod@mweb.co.za

Dear Dr A E Marshall

RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)

RE: ESKOM ENVIRONMENTAL IMPACT ASSESSMENT (DEA REF. NO.: 12/12/20/944) FOR A PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE - REVISED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT: REMINDER CLOSURE OF REVIEW PERIOD

I wish to register my strong opposition to the proposed nuclear power station. Apart from all the valid objections already advanced by experts in this field, I wish to state the following:

Comment 1:

1. French nuclear power experts have admitted that no nuclear power station could withstand the impact of a terrorist attack in the form of a bomb or other explosive means. Thus, natural disasters such as earthquakes and tsunamis are not the only potentially deadly hazard to contend with. In a highly volatile society such as ours, the possibility of such acts of sabotage cannot be ruled out.

Response 1:

Your comments are noted. A new nuclear plant as is the case with Koeberg will be classified as a National Key Point facility with controlled access. The National Intelligence Agency will perform a detailed threat analysis for the proposed power station prior to construction and will put in place an appropriate security exclusion zone and requirements for security at the power station, based on the findings of its analysis, these will not be made public for security reasons. This zone is specified to protect the power station from unauthorised access by the public. Currently, there is a security exclusion zone of 2 km offshore from the high water mark specified for Koeberg. Security aspects are also factored into the design of the plant. All potential risks are factored into the final design of the plant.

Comment 2:

2. The human error factor: if this was an important cause of the disaster in a highly advanced first-world country such as Japan, surely it would be an even more significant risk in South Africa which is relatively less developed technologically and in virtually every other way. One need only recall the potentially disastrous incident at Koeberg recently when the carelessness and ineptitude of an employee literally "threw a spanner in the works".

Response 2:

Thank you for your comment. It is well known that the main cause of the disaster at the Fukushima Plant was caused by a tsunami triggered by a magnitude 8.9 earthquake centred offshore of the city of Sendai on the eastern cost of Honshu island. It is acknowledged that the incident at Fukushima as a result of this natural disaster has highlighted many important safety factors in terms of the future of nuclear energy and is indeed a stark reminder of the unpredictability of the natural environment. However it is well known that South Africa is located on a vastly more stable tectonic environment that that of Japan which is situated close to a major subduction zone within the Pacific Ocean. The descriptions and facts reported in the Geological Hazard and Seismic Risk Assessment stem from published data and work undertaken by the CGS and others. In terms of the identification of faults and seismic risk the information represents the current knowledge and understanding based on a regional picture. It is acknowledged that new evidence of neotectonic movements may be discovered I n the more detailed investigations that still have to be undertaken to look for evidence of palaeo-seismicity and can alter the understanding of the tectonics and geology of the respective study areas. Please see Appendix E32 and E33 of the Revised EIR (Volume 2) for a more detailed discussion.

Lastly, \the “incident with the bolt at Koeberg” affected only the generator and had no impact on the nuclear reactor, nuclear fuel and any radioactive material. Nuclear safety was maintained at the highest level throughout the incident. Nobody was injured, and there was no risk to people or the environment as a result of the incident.

Comment 3:

3. As far as the selection of a nuclear power provider is concerned, there is a high probability that we have the makings of another Arms Deal scandal here. Who exactly will benefit from the selection of the nuclear provider? Will the tenderpreneurs be identified? .In view of the governments' determination to push through the highly contentious Protection of Information Bill, how much transparency will there be surrounding the decisions taken on the Nuclear Power Deal?

Is it conceivable that reassurance could be provided on all these issues? Without this, the proposed construction of any nuclear power station is completely unacceptable.

Response 3:

Your comments are noted. A preferred vendor for the supply and installation of PWR technology has not yet been chosen. A consistent dataset has been compiled for Nuclear-1 based on the specifications of all possible PWR III generation vendors and represents a conservative set of criteria that provides a “worst case scenario” in terms of the specifications of the proposed plant. Any vendor appointed will be done so in terms of this envelope. A credible commercial process will need to be followed.

Yours faithfully
for GIBB (Pty) Ltd

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Nuclear-1 EIA Team